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6 Attorneys for Defendant
7 AMERIPRISE FINANCIAL, INC.

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 DANIELLE O'NEILL, individually,
11 Plaintiff,

12 vs.

13 AMERIPRISE FINANCIAL, INC., a
14 Delaware Corporation, a Delaware
15 Corporation,
16 Defendant.

Case No. 2:19-cv-02233-JAD-EJY

~~PROPOSED~~ STIPULATION AND ORDER
TO CONTINUE DEADLINE RE FILING
RESPONSIVE PLEADING TO AMENDED
COMPLAINT (ECF No. 12)

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18 Plaintiff DANIELLE O'NEILL ("Plaintiff") and Defendant AMERIPRISE FINANCIAL,
19 INC. ("Defendant"), by and through their respective counsel of record, hereby stipulate and
20 agree that Defendant shall have one (1) additional week to file its responsive pleading to
21 Plaintiff's First Amended Complaint (ECF No. 12), which Amended Complaint was filed and
22 served on March 25, 2020 (ECF No. 12). The parties make this request due to scheduling
23 conflicts and need for additional time to investigate the allegations in the Amended Complaint in
24 order to respond.

25 Defendant filed a Motion for Partial Dismissal of Plaintiff's Complaint (ECF No. 10).
26 Plaintiff filed an Amended Complaint on March 25, 2020 (ECF No. 12). The Motion for Partial
27 Dismissal was denied as moot by the Court on March 27, 2020 (ECF No. 14).
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1 If the requested extension is granted, Defendant will file its response to Plaintiff's
2 Complaint on **April 15, 2020**.

3 This is the first request for an extension of time to file a responsive pleading to Plaintiff's
4 Amended Complaint made by the parties and the parties make this request in good faith and not for
5 the purpose of delay.

6 Dated: March 30, 2020

Dated: March 30, 2020

7 Respectfully submitted,

Respectfully submitted,

8
9 /s/ Andre M. Lagomarsino, Esq.
10 ANDRE M. LAGOMARSINO, ESQ.
LAGOMARSINO LAW



MONTGOMERY PAEK, ESQ.
Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON, P.C.

11 Attorney for Plaintiff

Attorneys for Defendants

12
13 **ORDER**

14 **IT IS SO ORDERED.**

15 Dated: March 31, 2020.

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18 UNITED STATES MAGISTRATE JUDGE

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